

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

APPLE INC.,

Plaintiff,

v.

MASIMO CORPORATION and
SOUND UNITED, LLC,

Defendants.

C.A. No. 22-1377-MN-JLH

JURY TRIAL DEMANDED

MASIMO CORPORATION,

Counter-Claimant,

v.

APPLE INC.,

Counter-Defendant.

APPLE INC.,

Plaintiff,

v.

MASIMO CORPORATION and
SOUND UNITED, LLC,

Defendants.

C.A. No. 22-1378-MN-JLH

JURY TRIAL DEMANDED

MASIMO CORPORATION and
CERCACOR LABORATORIES, INC.,

Counter-Claimants,

v.

APPLE INC.,

Counter-Defendant.

**DECLARATION OF PEDRO IRAZOQUI IN SUPPORT OF APPLE'S JULY 13, 2023
LETTER TO THE HONORABLE JENNIFER L. HALL FROM DAVID E. MOORE**

OF COUNSEL:

John M. Desmarais
Jordan N. Malz
Cosmin Maier
Kerri-Ann Limbeek
Jeffrey Scott Seddon, II
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400

Peter C. Magic
DESMARAIS LLP
101 California Street
San Francisco, CA 94111
Tel: (415) 573-1900

Jennifer Milici
Leon B. Greenfield
Dominic Vote
WILMER CUTLER PICKERING HALE
AND DORR LLP
2100 Pennsylvania Avenue NW
Washington, DC 20037
Tel: (202) 663-6000

Mark A. Ford
WILMER CUTLER PICKERING HALE
AND DORR LLP
60 State Street
Boston, MA 02109
Tel: (617) 526-6423

David E. Moore (#3983)
Bindu A. Palapura (#5370)
Andrew L. Brown (#6766)
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
abrown@potteranderson.com

*Attorneys for Plaintiff/Counter-Defendant
Apple Inc.*

DECLARATION OF PEDRO IRAZOQUI

I, Pedro Irazoqui, declare as follows:

1. I am a Professor of Electrical, Computer, and Biomedical Engineering in the Whiting School of Engineering at The Johns Hopkins University. I joined Johns Hopkins in July 2021. Prior to that, I was a Professor at Purdue University. Apple retained me to provide expert opinions in the above captioned cases (*Apple Inc. v. Masimo Corp. et al.*, United States District Court, District of Delaware, C.A. Nos. 22-1377-MN-JLH and 22-1378-MN-JLH, hereinafter “Cases”). I have personal knowledge of the facts set forth herein. If called upon to do so, I could and would testify to them.

2. I received a copy of the Protective Order entered in the Cases (Dkt. 119, hereinafter “Protective Order”). I read and understood the terms of the Protective Order, agreed to be bound by it, and consented to the jurisdiction of this Court for the purpose of any proceeding to enforce the terms of the Protective Order. I intend to abide by the Protective Order.

3. Neurava’s website lists me as a scientific advisor. That is because Neurava’s founders—Jay Shah and Vivek Ganesh—are my former Ph.D. students at Purdue. Dr. Shah completed his studies in August 2021. Dr. Ganesh completed his studies in November 2022.

4. I own shares in Neurava because its intellectual property came from my lab when I was at Purdue.

5. I do not work for or with Neurava in any way. I am not paid by Neurava, and Neurava does not sponsor any of the work in my lab. I do this deliberately, as I do not want any conflicts of interest between my federally funded research and a for-profit entity I have an equity stake in (Neurava).

6. I understand that Masimo’s commercial watch product—the W1—purports to do physiological monitoring through sensors.

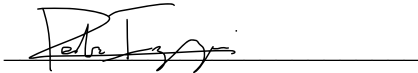
The Honorable Jennifer L. Hall

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7. All of my current funding is in therapeutics, *i.e.*, devices that stimulate or control physiological processes, rather than sensors to monitor. I have no current or planned research or work on technology for any (commercial or other) non-invasive physiological monitoring.

8. I do not have any information concerning Neurava's current or future products other than what is described on Neurava's public facing website.

Executed on July 13, 2023

A handwritten signature in black ink, appearing to read "Pedro Irazoqui", is written over a horizontal line.

Dr. Pedro Irazoqui